

EXHIBIT B

Saenz, Andres

From: Lin, Alvin <alin@morrisoncohen.com>
Sent: Tuesday, June 1, 2021 1:03 PM
To: Levander, Samuel; Saenz, Andres; Wright, Katerina
Cc: Bogale, Tsedey A.; Milito, Christopher
Subject: HFZ - Vale Subpoena response - written confirmations

Sam, Andres, Katerina:

Below are the written confirmations/statements that you had requested on our prior calls. I will put these into a more formal document response, but wanted to send you the language now as we had discussed.

- 1- HFZ confirms that it does not have Board Meeting minutes responsive to subpoena request no. 6.
- 2- HFZ confirms that it does not prepare company-wide financial statements, but instead prepares financial statements for individual projects.
- 3- HFZ confirms that upon his termination of employment with HFZ, Nir Meir retained his cellphone and did not surrender it to HFZ. HFZ further confirms that the HFZ-email was wiped from the device, but that HFZ did not have access to text messages and therefore did not erase them. HFZ has no knowledge as to whether or not text messages are in fact available. HFZ confirms that though HFZ-email was wiped from Mr. Meir's device, such email was backed up and/or maintained in the HFZ server.
- 4- HFZ states that the "tracing chart" that was previously produced was prepared by individual(s) working on behalf of Mr. Steinmetz using accounting records located at HFZ's office.

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